

I believe that broadcasters are not sufficiently meeting the needs of their communities and that they should be held to stricter rules of ascertainment and greater accountability. At present, broadcasters are held to very loose guidelines as to how they determine the needs and interests of their community. I feel that the FCC should reinstate an updated version of the guidelines that were applicable prior to the 1980s period of deregulation, requiring broadcasters to be more accountable to the FCC about their methods and use of ascertainment. By compelling broadcasters to verify that they have researched and addressed the community's concerns, through face-to-face interviews or surveys of key community leaders and a representative sample of the citizen population, the FCC will be able to monitor the licensee's methods of serving the local area. For instance, select broadcasting professors from local colleges and universities could help to assess the effectiveness of local stations and suggest innovative programming or novel stations that would be beneficial to the community at large by submitting yearly reports to the FCC emphasizing these points.

If it is discovered that the licensee is not meeting the minimum requirements of ascertainment, or if the community as a whole feels that the public interest would be better served by granting the license to another applicant, I believe that challengers to the licensee should be given a more equal opportunity to contest and vie for the license. In my opinion, the current method of "postcard renewal" -- and the accompanying great weight placed on the incumbent licensee -- is not consistent with the rules and flow of the marketplace and the laws of competition.

In sum, I do not believe that current market forces provide enough of an incentive for broadcast licensees to foster localism under the existing system of deregulation, and that local communities would be better served by the implementation of minimum guidelines and increased accountability for the ascertainment of the needs of the local population.